

**Comments of Gabel Associates**  
**Voluntary Green Power Choice Program**

Gabel Associates appreciates the opportunity to provide these comments.

- 1) GPSs should be permitted to include innovative products on the ballot. The Staff proposal at Page 12 may potentially limit GPSs to present only a 100%-of-usage product on the ballot. This restriction would limit severely the ability of GPSs to market more innovative products. Accordingly, the BPU should permit GPSs to include other products on the ballot so long as they have only renewable content. To do otherwise will frustrate the innovation which will create greater customer acceptability and greater market demand for renewables.

This issue was discussed more fully by Steven Gabel at the public hearing and will not be repeated here.

- 2) The Staff proposal at page 27 requires submission of a marketing plan. As was discussed and agreed to at various meetings, GPSs efforts will be subject to an after-the-fact performance review and submission of marketing plans was determined to be unnecessary and may hinder marketing flexibility. Accordingly, this requirement should be removed.
- 3) The Staff proposal at page 34 should be clarified to recognize termination of service to customers when they are late payers and the utility will no longer provide consolidated billing. Customers will be advised in their contract that GPM service will be automatically terminated if consolidated billing ceases. Accordingly, the notice requests at page 34 are not applicable to this situation. The Staff proposal should be so amended.
- 4) All customers, not just residential, should be included in this program.